

FILED

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
CAPE GIRARDEAU

the defendant herein, with the intent to injure, harass and intimidate another person, did use an electronic communication service, and an electronic communication system of interstate commerce, and a facility of interstate commerce, to engage in a course of conduct that placed that person in reasonable fear of death or serious bodily injury to that person, and the intimate partner of that person, and that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to that person, and an intimate partner of that person, in that Brian Rasberry sent mobile communications received as voice text messages by the cellular telephone number of that person, and threatened to cause harm and serious bodily injury to that person, and that person's intimate partner, which caused them substantial emotional distress and to be in

reasonable fear of death and serious bodily injury, in violation of Title 18, United States Code, Section 2261A(2).

**COUNT II**

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 7, 2018, in New Madrid County, within the Eastern District of Missouri, and elsewhere,

**BRIAN RASBERRY,**

the defendant herein, with the intent to injure, harass and intimidate another person, did use an electronic communication service, and an electronic communication system of interstate commerce, and a facility of interstate commerce, to engage in a course of conduct that placed that person in reasonable fear of death or serious bodily injury to that person, and the intimate partner of that person, and that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to that person, and an intimate partner of that person, in that Brian Rasberry sent mobile communications received as voice text messages by the cellular telephone number of that person, and threatened to cause harm and serious bodily injury to that person, and that person's intimate partner, which caused them substantial emotional distress and to be in reasonable fear of death and serious bodily injury, in violation of Title 18, United States Code, Section 2261A(2).

**COUNT III**

THE GRAND JURY CHARGES THAT:

On or about October 28, 2018, in New Madrid County, within the Eastern District of Missouri, and elsewhere,

**BRIAN RASBERRY,**

the defendant herein, with the intent to injure, harass and intimidate another person, did use an electronic communication service, and an electronic communication system of interstate commerce, and a facility of interstate commerce, to engage in a course of conduct that placed that person in reasonable fear of death or serious bodily injury to that person, an immediate family member of that person, and the intimate partner of that person, and that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to that person, an immediate family member of that person and the intimate partner of that person, in that Brian Rasberry sent mobile communications received as voice text messages by the cellular telephone number of that person, and threatened to cause harm and serious bodily injury to that person, an immediate family member of that person, and that person's intimate partner, which caused them substantial emotional distress and to be in reasonable fear of death and serious bodily injury, in violation of Title 18, United States Code, Section 2261A(2).

A TRUE BILL.

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FOREPERSON

JEFFERY B. JENSEN  
UNITED STATES ATTORNEY

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PAUL W. HAHN, #33190MO  
ASSISTANT UNITED STATES ATTORNEY